## LAW OFFICES JOHN S. WALLENSTEIN 1100 FRANKLIN AVENUE GARDEN CITY, NEW YORK 11530

(516) 742-5600 FAX (516) 742-5040 EMAIL: JSWallensteinEsq@outlook.com

March 3, 2021

## **VIA ECF**

Hon. Denis R. Hurley United States District Judge 1020 Federal Plaza Central Islip, New York 11722

> Re: United States v. Cabasso, et al Docket # 19 CR 582 (DRH) Defendant Alan Schwartz

Dear Judge Hurley;

I represent Alan Schwartz in this matter, along with Richard D. Willstatter, Esq. Mr. Schwartz is at liberty on a \$250,000 bond, secured by a home in Smithtown owned by his girlfriend, Laurie Rosen, with whom he resides. Ms. Rosen and Mr. Schwartz' daughter are the suretors on his bond. I write to respectfully request a modification of the bond conditions to remove the property as security, and to permit the bond to remain unsecured, but otherwise unchanged.

Ms. Rosen is seeking to sell her house, and she and Mr. Schwartz will continue to reside together in Florida, where they are purchasing a home jointly. In order to sell the property, the Government's lien must be satisfied and removed. I have discussed this issue with AUSA Alex Mindlin, and the Government does not object to the requested relief.

Thank you for your courtesy and consideration.

Respectfully yours,

JOHN S. WALLENSTEIN

John S. Wallenstein

JSW/hs